

HMIS Security Audit Checklist

Agency Name

Audit Date: _____

Audit reviewed with: _____
Agency Staff Name and Title

Audit conducted by: _____
Agency Staff Name and Title

Audit Approved by: _____
Agency Staff Name and Title

Audit Approved Date: _____
Agency Staff Name and Title

Follow up Visit Required? _____ Yes _____ No

Proposed Next Audit Date: _____

Notes:

This checklist is a *controlled document*. Information contained herein should be considered security information and is not for distribution. An authorized signature approval process should be followed for release of this information to other parties. Failure to adhere to this process will result in penalties and disciplinary action up to and including dismissal. The signature on this document implies that a best effort to identify risks to the business has been performed, and is an agreement that the measures taken are considered by management to be appropriate to the risk.

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Requirement	Description	Response	Assessment	Action Needed:
Data Collection	Does the agency have a data collection form and/or protocol that captures universal and program specific (where applicable) data elements? UDE – FR p. 45905 PDE – FR p. 45914	Yes	Agency: <input type="checkbox"/> Y <input type="checkbox"/> N Has a data collection form or protocol <input type="checkbox"/> Y <input type="checkbox"/> N Is aware of ICHHI HMIS Paper Intake/Discharge Forms <input type="checkbox"/> Y <input type="checkbox"/> N Is capturing Universal Data Elements on all clients <input type="checkbox"/> Y <input type="checkbox"/> N Is capturing Program Data Elements as required <input type="checkbox"/> Y <input type="checkbox"/> N Monitors data quality Users: <input type="checkbox"/> Y <input type="checkbox"/> N Have been trained on revised protocol Special population considerations: _____ _____ _____	
		No	No updated data collection protocol.	
Privacy: Posted Notice	Does the agency have the HMIS Notice of Privacy Practices posted at every place where intake occurs?	Yes	_____ # of intake locations _____ # of posted Notices <input type="checkbox"/> Y <input type="checkbox"/> N Notice includes purpose for data collection <input type="checkbox"/> Y <input type="checkbox"/> N Copy of notice is available upon client request	
		No	No posted sign at intake desk	
Privacy: Privacy Policy	Does the agency have a privacy policy (Notice)? Is the policy (Notice) posted on the website (national parent organizations excluded).	Yes	Policy (Notice) Version Date: _____ / _____ / _____ Reasonable accommodations. Does agency need Notice in: <input type="checkbox"/> Y <input type="checkbox"/> N Spanish? <input type="checkbox"/> Y <input type="checkbox"/> N Other languages that are <i>common</i> in their area? <input type="checkbox"/> Y <input type="checkbox"/> N Braille, Audio, or Large Print? (circle all that apply) <input type="checkbox"/> Y <input type="checkbox"/> N Hard copy of Notice is available upon request <input type="checkbox"/> Y <input type="checkbox"/> N Notice is posted at www. _____ (if applicable)	
		No	No privacy notice is available	

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Requirement	Description	Response	Assessment	Action Needed:
User Authentication	Does the agency abide by the HMIS policies for unique user names and password?	Yes	<p><input type="checkbox"/> Y <input type="checkbox"/> N Agency abides by HMIS Policies and Procedures</p> <p>_____ Number of HMIS users at agency</p> <p>All HMIS users at the agency are aware that they should:</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N NEVER share username and passwords</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N NEVER keep usernames/passwords in public locations</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N NEVER use their internet browser to store passwords</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N All users have signed a receipt of compliance for staff</p>	
		No	Agency does not abide by HMIS user authentication policy	
Hard Copy Data	Does agency have procedures in place to protect hard copy Personal Protected Information (PPI) generated from or for the HMIS?	Yes	<p>Agency has procedure for hard copy PPI that includes:</p> <p>(1) Security of hard copy files</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Locked drawer/file cabinet</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Locked office</p> <p>(2) Procedure for client data generated from the HMIS</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Printed screen shots</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N HMIS client reports</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Downloaded data into Excel</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Copy of above procedures is available</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Agency trains all staff on hard copy procedures</p>	
		No	Agency does not have a procedure to protect hard copy PPI	
PPI Storage	Does the agency dispose of or remove identifiers from a client record after a specified period of time? (Minimum standard: 7 years after PPI was last changed if record is not in current use.)	Yes	<p><input type="checkbox"/> Y <input type="checkbox"/> N Agency has a procedure</p> <p>Describe procedure:</p> <p>_____</p> <p>_____</p>	
		No	Agency does not have procedure to dispose of or remove identifiers.	

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Virus Protection	Do all computers have virus protection with automatic update? (This includes non-HMIS computers if they are networked with HMIS computers.)	Yes	<p>___ Y ___ N Auditor spot checks several computers</p> <p>Virus software and version _____</p> <p>___ Y ___ N Auto-update turned on</p> <p>Date last updated: ____ / ____ / ____</p> <p>Person responsible for monitoring/updating: _____</p>	
		No	No Virus protection installed.	
Firewall	Does the agency have a firewall on the network and/or workstation(s) to protect the HMIS systems from outside intrusion?	Yes	<p>Single computer agencies:</p> <p>___ Y ___ N Individual workstation</p> <p>Version: _____</p> <p>Networked (multiple computer) agencies:</p> <p>___ Y ___ N Network firewall</p> <p>Version: _____</p>	
		No	Individual workstation or network firewall not active.	
		No	PKI not active	

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Physical Access	Are all HMIS workstations in secure locations or are they manned at all times if they are in publicly accessible locations? (This includes non-HMIS computers if they are networked with HMIS computers.)	Yes	<p>All workstations are:</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N In secure locations (locked ofcs) or manned at all times</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Using password protected screensavers</p> <p>All printers used to print hard copies from the HMIS are:</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N In secure locations</p> <p>Data Access:</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Users may access HMIS from outside the workplace</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N If yes, Agency has a data access policy</p>	
		No	Not all workstations are manned at all times or are in secure locations.	
Data Disposal	Does the agency have policies and procedures to dispose of hard copy PPI or electronic media?	Yes	<p><input type="checkbox"/> Y <input type="checkbox"/> N Agency shreds all hardcopy PPI before disposal</p> <p>Before disposal, the Agency reformats/degausses (demagnetizes):</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Disks</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N CDs</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Computer hard-drives</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Other media (tapes, jump drives, etc)</p>	
		No	The agency does not have policies and procedures for data disposal	
Software Security	Do all HMIS workstations have current operating system and internet browser security? (This includes non-HMIS computers if networked with HMIS computers.)	Yes	<p>Operating System (OS) Version: _____</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N All OS updates are installed</p> <p><input type="checkbox"/> Y <input type="checkbox"/> N Most recent version of Internet Browser(s) are installed</p>	
		No	Not all workstations have current software security	